

3. CMO-1 also requires the parties to consolidate briefing when possible to “avoid duplicative briefing by incorporating similar arguments by reference” and “not to repeat arguments in subsequent cases or briefs.” Doc. 232 at 4. Purdue and Endo (“Manufacturer Defendants”) collectively filed one Motion to Dismiss (Doc. 690) while McKesson, as the sole distributor, submitted its own Motion to Dismiss (Doc. 689). These motions were filed on June 29, 2018.

4. Under CMO-1 and Local Rule 7.1, Alabama is entitled to file 2 briefs of 30 pages each to respond to the Manufacturer Defendants and McKesson’s Motions to Dismiss.

5. Under CMO-1, the deadline for Alabama to file its responses is **July 27, 2018**.

6. Consistent with CMO-1’s order to “consolidate briefing” and “avoid duplicative briefing,” *id*, Alabama and the Defendants agree on the following:

- a. Alabama may file one combined Response brief, not to exceed 50 pages, in opposition to the Defendants’ motions to dismiss.
- b. Extending Alabama’s deadline to file its Response by 7 days or until **August 3, 2018**.
- c. This extension would likewise push back the deadlines for the Defendants to file their Replies and the States Attorneys General to file their amicus briefs by 7-days.

7. Having consulted with the Defendants, Alabama reports that no Defendant has opposed Alabama’s filing of a Consolidated Response or the above-requested 7-day extension.

WHEREFORE, Alabama respectfully requests an Order from the Court granting its Unopposed Motion to File a Consolidated Brief in Response to the Defendants’ Motions to Dismiss and Motion for an Extension to file its Consolidated Response to August 3, 2018, and

further adjusting the amicus and Defendant's deadlines accordingly. For the Court's convenience, Alabama has attached a proposed order as Exhibit A.

Respectfully submitted,

/s/ Rhon E. Jones

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CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2018, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtain through, the Court CM/ECF Systems.

/s/ Rhon E. Jones

Deputy Attorney General